

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**PLAINTIFFS' WITNESS AND EXHIBIT LIST FOR HEARINGS
SET FOR TUESDAY, JUNE 10, 2025
(Reference Docket Nos. 436 & 437)**

KrisJenn Ranch, LLC; KrisJenn Ranch, LLC-Series Uvalde Ranch; KrisJenn Ranch, LLC-Series Pipeline ROW (Collectively, “KrisJenn”); and Larry Wright (“Wright”) (together, the “Plaintiffs”) reserves the right to call any or all of the following as witnesses at the above-referenced hearings, including, but not limited to, by affidavit, declaration, or proffer.

1. Larry Wright;
 2. Any witness called or designated by any other party; and
 3. Any rebuttal or impeachment witnesses, as appropriate.

The Debtor reserves all rights to introduce and/or request judicial notice of any or all of the following exhibits as evidence at the hearings, each as may be amended, and expressly including

any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto:

<i>Motion Seeking Stay Pending Appeal Pursuant to FRBP8007(a)(1)(A) and Establishing Bond Amount (Docket No. 436)</i>			
No.	Exhibit	Offered	Admitted
P-1	Motion Seeking Stay Pending Appeal Pursuant to FRBP 8007(a)(1)(A) and Establishing Bond Amount (Docket No. 436)		
P-2	Writ of Execution to the United States Marshal		
P-3	Subpoena to Testify at a Deposition in a Civil Action to Corporate Representative for Express H2O Pipeline & ROW, LLC set for June 18, 2025		
P-4	Notice of Oral Deposition in Aid of Judgment of Larry Wright		
P-5	Plaintiff's Second Amended Original Petition <i>In re: Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, LP; Cause No. CV-00461-24-08; In the District Court of Angelina County; 159th/217th Judicial District</i>		
P-6	Defendant Westlake Chemical OPCO, LP's Second Amended Original Answer and Petition for Declaratory Judgment <i>In re: Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, LP; Cause No. CV-00461-24-08; In the District Court of Angelina County; 159th/217th Judicial District</i>		

P-7	Agreed Amended Docket Control Order – Level Three In re: <i>Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, LP</i> ; Cause No. CV-00461-24-08; In the District Court of Angelina County; 159 th /217 th Judicial District		
P-8	Appellants' Brief In re: <i>DMA Properties, Inc., et al. vs. KrisJenn Ranch, LLC</i> , et al.; Case No. 5:24-cv-00365-XR; In the United States District Court for the Western District of Texas		
P-9	Proposed Order Granting Motion Seeking Stay Pending Appeal Pursuant to FRBP 8007(a)(1)(A) and Establishing Bond Amount (Docket No. 436-4)		
	Any document entered or filed in the above-styled bankruptcy case, including any exhibits thereto.		
	All exhibits necessary for impeachment and/or rebuttal purposes		
	All exhibits identified by or offered by any other party at the hearing.		

<i>Motion to Quash Deposition Notices (Docket No. 437)</i>			
No.	Exhibit	Offered	Admitted
P-1	Motion to Quash Deposition Notices (Docket No. 437)		
P-2	Amended Notice of Oral Deposition in Aid of Judgment of Larry Wright		
P-3	Amended Notice of Oral Deposition in Aid of Judgment of KrisJenn Ranch, LLC		

P-4	Amended Notice of Oral Deposition in Aid of Judgment of KrisJenn Ranch, LLC – Series Uvalde Ranch		
P-5	Amended Notice of Oral Deposition in Aid of Judgement of KrisJenn Ranch, LLC – Series Pipeline ROW		
P-6	<p>Plaintiff's Second Amended Original Petition</p> <p>In re: <i>Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, LP</i>; Cause No. CV-00461-24-08; In the District Court of Angelina County; 159th/217th Judicial District</p>		
P-7	<p>Defendant Westlake Chemical OPCO, LP's Second Amended Original Answer and Petition for Declaratory Judgment</p> <p>In re: <i>Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, LP</i>; Cause No. CV-00461-24-08; In the District Court of Angelina County; 159th/217th Judicial District</p>		
P-8	<p>Agreed Amended Docket Control Order – Level Three</p> <p>In re: <i>Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, LP</i>; Cause No. CV-00461-24-08; In the District Court of Angelina County; 159th/217th Judicial District</p>		
P-9	<p>Appellants' Brief</p> <p>In re: <i>DMA Properties, Inc., et al. vs. KrisJenn Ranch, LLC, et al.</i>; Case No. 5:24-cv-00365-XR; In the United States District Court for the Western District of Texas</p>		
P-10	Proposed Order Granting Motion to Quash Deposition Notices (Docket No. 437-5)		
	Any document entered or filed in the above-styled bankruptcy case, including any exhibits thereto.		

	All exhibits necessary for impeachment and/or rebuttal purposes		
	All exhibits identified by or offered by any other party at the hearing.		

Dated: June 9, 2025

Respectfully submitted,

HAYWARD PLLC

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Ranch; KrisJenn Ranch, LLC-Series
Pipeline ROW; and Larry Wright*

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2025, the foregoing was served via CM/ECF on all parties requesting such service. Additionally, on June 9, 2025, or within one business day thereof, the foregoing was served without exhibits via United States First Class Mail to the parties listed below.

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<i>United States Trustee</i>	<i>Counsel for Black Duck Properties, LLC</i>
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/s/ Charlie Shelton
Charlie Shelton

